

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
v.)
)
DUSTIN BOONE,) No: 4:18-CR-00975 CDP (JMB)
RANDY HAYS,)
CHRISTOPHER MYERS, and)
BAILEY COLLETTA,)
)
Defendants.)

**GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

COMES NOW the United States of America by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said District, and makes the following disclosure pursuant to Federal Rule of Criminal Procedure 12(b)(4).

At trial, the Government intends to use the evidence seized and statements made by the defendants and other witnesses during the events described below, and as described in the discovery letter and its attachments provided to defense counsel on January 18, 2019. This evidence and these statements are more fully set forth in the investigative reports and search warrant returns, which have been made available to defendants. The Government has listed the evidence below that it believes a defendant could possibly argue standing to contest, although the Government is in no way conceding that any defendant, in fact, has standing on these events.

Also, as additional evidence is found, and as supplemental information comes to the Government's attention, the Government may choose to use evidence in addition to that listed below. Therefore, a supplemental Rule 12(b)(4) notice may be filed at a later date.

EVENT/ITEM	DEFENDANT(S)
Bailey Colletta Statement-FBI 302	Bailey Colletta
Search Warrant for AT&T account (***) ***-2735 (4:18-MJ-0008 DDN)	Randy Hays
Search Warrant for Apple, Inc. account (***) ***-8002 (4:18-MJ-6003 PLC) (4:18-MJ-1197 JMB) (4:18-MJ-3327 NCC)	Dustin Boone
Search Warrant for Apple-brand cellular phone seized from D. Boone (4:18-MJ-1147 JMB) (4:18-MJ-1149 JMB)	Dustin Boone
Search Warrant for HTC-brand cellular phone seized from R. Hays (4:18-MJ-1165 JMB)(4:18-MJ-3184 NCC)	Randy Hays
Search Warrant for Samsung-brand cellular phone seized from C. Myers (4:18-MJ-1166 JMB) (4:18-MJ-3355 NCC)	Christopher Myers
Search Warrant for Verizon, Inc. account (***) ***-8002 (4:18-MJ-6004 PLC)	Dustin Boone
Dustin Boone Statement-FBI 302	Dustin Boone

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/s/ Jennifer A. Winfield
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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record.

/s/ Jennifer A. Winfield
JENNIFER A. WINFIELD, #53350MO
Assistant United States Attorney